



The Voice of Rural Telecommunications

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: CC Docket No. 92-77

Yesterday, the National Telephone Cooperative Association filed Comments in response to the Commission's Further Notice of Proposed Rulemaking, FCC 94-117, released on June 6, 1994, regarding Billed Party Preference for 0+ InterLATA Calls. Page four of the Comments was inadvertently omitted from the filing. Page four is attached so that it can be included with the Comments filed yesterday. All parties who have not received page four will be mailed the omitted page.

If you have any questions, please contact the undersigned.

Sincerely yours,

David Cosson
Vice President
Legal and Industry

DC:rhb

Enclosure

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can one determine the merits of BPP.³ This sort of evaluation argues against the Commission adopting generalized conclusions and universal rules.

In any event, there is certainly many rural areas where the number of O+ calls and the number of affected transient users will be small, and this will mean that the per-unit cost of BPP will be enormous. Therefore, at the very least, should the Commission decide to move forward with its generalized requirement (which NTCA does not favor), then end offices below a specific cost/benefit limiting size should be exempt from any mandatory requirement.⁴

II. BPP IS UNNECESSARY; MEASURES ARE ALREADY IN PLACE THAT WILL ACHIEVE THE SAME BENEFITS AS PERCEIVED TO BE PROMOTED BY BPP.

Fundamentally, the potential benefits of BPP will flow to transient callers⁵ who must make interLATA calls, but without BPP would not otherwise be able to have their call carried by their carrier of choice.⁶ Problems associated with callers who

³ Using Rural Electrification Administration borrower data, small and rural telcos typically have less than 10 paystations per exchange. While impossible to determine accurately, the number of transient users must be small relative to urban highly-populated areas.

⁴ NTCA believes that 10,000 access lines per end office would be an appropriate cut-off point.

⁵ Transient callers are those who must make calls from phones that are not necessarily presubscribed to their carrier of choice. Most often, this will involve calls made from payphones.

⁶ O+ interLATA calls placed from normal residential and business line phones already presubscribed to IXC's do not appear to present any problem to be solved by BPP. Presumably, the
(continued...)

CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Comments of the National Telephone Cooperative Association in CC Docket No. 92-77 was served on this 2nd day of August 1994, by first-class, U.S. Mail, postage prepaid, to the following persons on the attached service list:


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